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18 [Additional Counsel Listed on Signature Page]

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

21 CITY OF OAKLAND,

22 Plaintiff,

23 v.

24 THE OAKLAND RAIDERS, A
 25 CALIFORNIA LIMITED PARTNERSHIP;
 ARIZONA CARDINALS FOOTBALL CLUB
 LLC; ATLANTA FALCONS FOOTBALL
 26 CLUB, LLC; BALTIMORE RAVENS
 LIMITED PARTNERSHIP; BUFFALO
 BILLS, LLC; PANTHERS FOOTBALL,
 LLC; THE CHICAGO BEARS FOOTBALL
 27 CLUB, INC.; CINCINNATI BENGALS,

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Attorneys for Defendants THE NATIONAL FOOTBALL LEAGUE and all NFL Clubs other than The Oakland Raiders

CASE NO. 3:18-cv-07444-JCS

JOINT CASE MANAGEMENT STATEMENT

Date: July 19, 2019
 Time: 9:30 a.m.
 Crtrm.: G - 15th Floor

Trial Date: August 2, 2021

1 INC.; CLEVELAND BROWNS FOOTBALL
 2 COMPANY LLC; DALLAS COWBOYS
 3 FOOTBALL CLUB, LTD.; PDB SPORTS,
 4 LTD.; THE DETROIT LIONS, INC.; GREEN
 5 BAY PACKERS, INC.; HOUSTON NFL
 6 HOLDINGS, LP; INDIANAPOLIS COLTS,
 7 INC.; JACKSONVILLE JAGUARS, LLC;
 8 KANSAS CITY CHIEFS FOOTBALL
 9 CLUB, INC.; CHARGERS FOOTBALL
 10 COMPANY, LLC; THE RAMS FOOTBALL
 11 COMPANY, LLC; MIAMI DOLPHINS,
 12 LTD.; MINNESOTA VIKINGS FOOTBALL,
 13 LLC; NEW ENGLAND PATRIOTS LLC;
 14 NEW ORLEANS LOUISIANA SAINTS,
 15 LLC; NEW YORK FOOTBALL GIANTS,
 16 INC.; NEW YORK JETS LLC;
 17 PHILADELPHIA EAGLES, LLC;
 18 PITTSBURGH STEELERS LLC; FORTY
 19 NINERS FOOTBALL COMPANY LLC;
 20 FOOTBALL NORTHWEST LLC;
 21 BUCCANEERS TEAM LLC; TENNESSEE
 22 FOOTBALL, INC; PRO-FOOTBALL, INC.;
 23 and THE NATIONAL FOOTBALL
 24 LEAGUE,

13 Defendants.
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 16 The parties to the above-entitled action jointly submit this Joint Case Management
 17 Statement in advance of the Case Management Conference set for July 19, 2019 at 9:30 a.m. or as
 18 soon thereafter as this matter may be heard.

19 **1. Defendants' Motion to Dismiss**

20 On March 1, 2019, Defendants filed a Motion to Dismiss (Dkt. 41). The Motion is fully
 21 briefed and is set to be heard on July 19, 2019 at 9:30 a.m. – concurrently with the Case
 22 Management Conference. *See* Dkts. 43, 50.

23 **2. Discovery**

24 At the March 22, 2019 Initial Status Conference, the Court permitted the parties to engage
 25 in limited discovery. The Parties have met and conferred regarding a Stipulation and [Proposed]
 26 Order Regarding the Protocol for the Production of Electronically Stored Information and Hard
 27 Copy Documents and a [Proposed] Stipulated Protective Order Regarding the Disclosure and Use
 28 of Discovery Materials and submit said documents for the Court's approval concurrently herewith.

1 Further, Plaintiff has served Requests for Production of Documents on Defendants The
 2 Oakland Raiders and National Football League. Defendant The Oakland Raiders has served the
 3 same on Plaintiff. The engaged parties have each served objections and responses to the requests
 4 and the meet and confer process is under way. Pursuant to the Local Rules, the engaged parties
 5 have each made initial offers of production.

6 While there are no discovery disputes that require the Court's attention at this time, the
 7 Parties seek clarification from the Court regarding the timing of production. It is Plaintiff's
 8 position that production of these documents (for some of which, in Plaintiff's view, there is no
 9 associated burden) should begin immediately. It is Defendants' position that no production should
 10 occur until the Motion to Dismiss and any potential future motions to dismiss on amended
 11 complaints are decided.

12 3. Scheduling

13 After considering the positions of the Parties, the Court set the following Schedule at the
 14 March 22, 2019 Initial Case Management Conference:

<i>Event</i>	<i>Date</i>
Initial Round of Document Demands and Responses (Plaintiff, NFL and Oakland Raiders)	July 19, 2019 – Motion to Dismiss Hearing
Non-Expert Discovery Cutoff	June 30, 2020
Plaintiff Expert Disclosures	July 30, 2020
Defendants' Expert Disclosures	September 30, 2020
Plaintiff Expert Reports Due	July 30, 2020
Defendants' Expert Reports Due	September 30, 2020
Expert Rebuttal Disclosures	October 30, 2020
Expert Discovery Cutoff	November 30, 2020
Dispositive Motions To Be Filed	January 15, 2021
Reply to Dispositive Motions	February 5, 2021
Hearing re Dispositive Motions	March 5, 2021 @ 9:30 a.m.

1	<i>Event</i>	<i>Date</i>
2	To Be Filed: (1) Jointly Proposed Final Pretrial Order (2) Joint Set of Proposed Instructions on Substantive Issues (3) Joint Set of Voir Dire Questions (4) Submit Motions in Limine (5) Trial Briefs (6) Proposed Verdict Forms	June 9, 2021
3	Opposition to Motions in Limine	June 18, 2021
4	File Motions in Limine (Pair)	June 18, 2021
5	Serve Objections to Exhibits	June 29, 2021
6	Pretrial Conference	July 9, 2021 @ 2:00 p.m.
7	Trial	August 2, 2021 @ 8:30 a.m.

13 3. Other

14 The parties have no other matters to bring before the Court at this time.

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1 DATED: July 12, 2019

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3 By: /s/ Maria Bee
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1 DATED: July 12, 2019

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19 *FOOTBALL LEAGUE and all NFL Clubs other*
20 *than The Oakland Raiders*

21 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

22 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
23 document has been obtained from each of the signatories hereto.

24 By: /s/ Michael H. Pearson
25 MICHAEL H. PEARSON

26 *Attorney for Plaintiff City of Oakland*